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12 Specially Appearing Attorneys for  
13 Defendants Tony Diab and Daniel S. March

14 **UNITED STATES BANKRUPTCY COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**  
16 **SANTA ANA DIVISION**

17 In re:

18 THE LITIGATION PRACTICE  
19 GROUP, PC,

20 Debtor.

21 RICHARD A. MARSHACK,  
22 Chapter 11 Trustee,

23 Plaintiff,

24 vs.

25 TONY DIAB, an individual; DANIEL  
26 S. MARCH, an individual; ROSA  
27 BIANCA LOLI, an individual; LISA  
28 COHEN, an individual; WILLIAM  
TAYLOR CARSS, an individual; ENG  
TAING, an individual; MARIA EEYA  
TAN, an individual; JAKE AKERS, an  
individual; HAN TRINH, an  
individual; JAYDE TRINH, an  
individual; JAYDE TRINH, an  
individual; WES THOMAS, an  
individual; SCOTT JAMES EADIE, an  
individual; JIMMY CHHOR, an

Case No.: 8:23-bk-10571-SC

Hon. Scott C. Clarkson

Chapter 11

Adversary No. 8:23-ap-01046-SC

**STIPULATION TO EXTEND  
TIME TO RESPOND TO  
AMENDED COMPLAINT**

**Complaint Filed: May 25, 2023**

**STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED  
COMPLAINT**

individual, DONGLIANG JIANG, an  
individual; MAS CHOU, an individual;  
OAKSTONE LAW GROUP PC;  
GREYSON LAW CENTER PC;  
PHOENIX LAW, PC; MAVERICK  
MANAGEMENT GROUP, LLC; LGS  
HOLDCO, LLC; CONSUMER  
LEGAL GROUP, P.C.; VULCAN  
CONSULTING GROUP LLC; BAT  
INC. d/b/a COAST PROCESSING;  
PRIME LOGIX, LLC; TERACEL  
BLOCKCHAIN FUND II LLC; EPPS;  
EQUIPAY; AUTHORIZE.NET;  
WORLD GLOBAL; OPTIMUMBANK  
HOLDINGS, INC. d/b/a OPTIMUM  
BANK; MARICH BEIN, LLC;  
BANKUNITED, N.A.; REVOLVE3,  
INC.; FIDELITY NATIONAL  
INFORMATION SERVICES, INC.  
d/b/a/ FIS; WORLDPAY, LLC;  
WORLDPAY GROUP; MERIT  
FUND, LLC; GUARDIAN  
PROCESSING, LLC; PAYLIANCE,  
LLC; TOUZI CAPITAL, LLC;  
SEAMLESS CHEX INC.; DWOLLA,  
INC.; STRIPE, INC.; and DOES 1  
through 100, inclusive,

Defendants.

1 WHEREAS this Adversary Proceeding was commenced by Plaintiff Richard  
2 Marshack as Chapter 11 Trustee ("Trustee") on May 25, 2023;

3 WHEREAS on June 15, 2023, the Trustee filed an Amended Complaint,  
4 which the Trustee indicates was served on Defendants Tony Diab and Daniel  
5 March (collectively "Defendants") on June 23, 2023;

6 WHEREAS based on the Trustee's indicated service date, Defendants'  
7 deadline to respond to the Amended Complaint is July 26, 2023;


8 WHEREAS in light of recent developments in the Debtor's main  
9 bankruptcy case, the parties are discussing further amendment and/or resolution of  
10 this Adversary Proceeding;

11 NOW THEREFORE, the parties hereby stipulate and agree, as follows:

- 12 1. Defendants Tony Diab and Daniel March shall have up to and including  
13 August 16, 2023 to file and serve any responsive pleading to the  
14 Amended Complaint.


15 DATED: July 26, 2023

**ENENSTEIN PHAM & GLASS, LLP**

16  
17 By:   
18 Teri T. Pham  
19 Specially Appearing Attorneys for  
20 Defendants Tony Diab and Daniel S.  
21 March

22 DATED: July 26, 2023

**DINSMORE & SHOHL, LLP**

23  
24 By:   
25 Christopher B. Ghio  
26 Attorneys for Chapter 11 Trustee  
27 Richard Marshack  
28

**[PROPOSED] ORDER**

Having read and considered the foregoing stipulation of the parties, IT IS  
SO ORDERED.

Dated: \_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

3200 Bristol St. Suite 500  
Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): Stipulation to Extend Time to Respond to Amended Complaint

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 07/26/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See NEF for confirmation of electronic transmission to the U.S. Trustee and any trustee in this case, and to any attorneys who receive service by NEF.

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

07/26/2023

Duc Le

Date

Printed Name

  
Signature